

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TREVOR KEVIN BAYLIS,

Plaintiff,

v.

VALVE CORPORATION,

Defendant.

Case No. 2:23-cv-01653-RSM

PLAINTIFF

TREVOR KEVIN BAYLIS

REQUEST FOR ADMISSION SET 4

Filed: 24th March 2024

PROPOUNDING PARTY: Trevor Kevin Baylis

RESPONDING PARTY: Valve Corporation

REQUEST FOR ADMISSION SET 4

TO ANY DEFENDANT AND COUNSEL OF RECORD:

Pursuant to Federal Rules of Civil Procedure 36. It is hereby requested and demanded of Defendant “Valve” that Valve make admission of following statements of facts which are of material significance to the case at hand, Baylis v Valve Corporation, in accordance to rule 36 of the Federal Rules of Civil Procedure under which this request is made, to answer the following facts, and that such answers be sworn and filed in the office of the District Court Clerk where this case in pending, and file an answer to

1 the author of this request in writing, 30 days of serving this request upon Valve. Or else,
2 each of the matters within this request for admission, shall and must be admitted by
3 Valve in accordance to rule 36 of the Federal Rules of Civil Procedure.
4

5 **1. REQUEST FOR ADMISSION TRUTH OF FACTS**

6 Admit that the following facts are true:
7

8 **REQUEST FOR ADMISSION NUMBER 1.**

9 1. Admit that in the case at hand, “Baylis v Valve Corporation”, Valve’s
10 subscriber Topware Entertainment from Germany (Rittnertstraße 36, 76227 Karlsruhe),
11 also known as Topware Interactive and AC Enterprises e.K. (“Partner”) who are the
12 developers of Iron Sky Invasion games, which are subject to this case, do not have a US
13 Copyright Office registration for any Iron Sky Invasion games.

14 **REQUEST FOR ADMISSION NUMBER 2.**

15 2. Valve admit that their Partner do not have any US Copyright Office
16 registration for any 3D models, artworks or animated sequences related to the film Iron Sky.

17 **REQUEST FOR ADMISSION NUMBER 3.**

18 3. Valve admit that their Partner do not have any valid exclusive license from
19 Baylis to make any adaptations of the film Iron Sky via any legitimate Chain of Title.

20 **REQUEST FOR ADMISSION NUMBER 4.**

21 4. Valve admit that their Partner do not have any valid assignment of copyright
22 from Baylis to make any adaptations of the film Iron Sky via any legitimate Chain of Title.

23 **REQUEST FOR ADMISSION NUMBER 5.**

24 5. Valve admit that their Partner do not have any standing to seek “remedies

and protections” for any potential copyright infringement related to Iron Sky works.

REQUEST FOR ADMISSION NUMBER 6.

6. Valve admit that Valve also, do not have any standing to seek “remedies and protections” for any potential copyright infringement related to Iron Sky works.

REQUEST FOR ADMISSION NUMBER 7.

7. Valve admit that Valve also, do not have any US Copyright Office registration for any 3D models, artworks or animated sequences related to the film Iron Sky.

REQUEST FOR ADMISSION NUMBER 8.

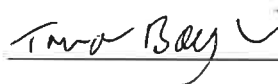
8. Valve admit that Valve also, do not have any valid exclusive license from Baylis to make any adaptations of the film Iron Sky via any legitimate Chain of Title.

REQUEST FOR ADMISSION NUMBER 9.

8. Valve admit that under USC 17 §103(a) their Partner’s use of Baylis’ copyrighted work without a valid license from him means copyright does not extend to any part of Iron Sky Invasion games . (See Anderson v. Stallone and The Tolkien Tr. v. Polychron).

This “Request for Admission Set 4” is made Pursuant to Federal Rules of Civil Procedure 36.

24th March 2024



Trevor Kevin Baylis
Jankanraitti, Tampere 33560, FINLAND

Please note: Plaintiff is dyslexic. Thus written documents such as this may have minor accidental spelling and or grammatical errors. Such things should not be seen as cause to prejudice the author of this document.

CERTIFICATE OF SERVICE FORM

FOR ELECTRONIC FILINGS

I hereby certify that on 24th March 2024 I electronically filed the foregoing document
with the United States District Court

Western District of Washington at Seattle by using the
CM/ECF system. I certify that the following parties or their counsel of
record are registered as ECF Filers and that they will be served by the

CM/ECF system:

Jeremy E Roller: jroller@aretelaw.com,

jfischer@aretelaw.com,

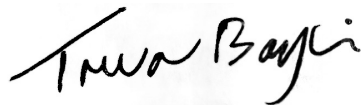
kgreenberg@aretelaw.com

Jonah O. Harrison: jharrison@aretelaw.com,

jfischer@aretelaw.com,

kgreenberg@aretelaw.com

Dated: 24th March 2024



Trevor Kevin Baylis

Jankanraitti

Tampere 33560, FINLAND